

FINGER & SLANINA, LLC
ATTORNEYS AT LAW

January 18, 2023

Via EM/ECF and Hand-Delivery

The Hon. John T. Dorsey
824 N Market St
5th Floor, Courtroom 5
Wilmington, DE 19801

Re: *In re FTX Trading Ltd., et al.*, Case No. 22-11068

Dear Judge Dorsey:

I write as counsel for the Media Intervenors. Your Honor has scheduled a status conference regarding continued sealing of the names of creditors in the above-referenced action for Friday, January 20, 2023. I am unable to participate in person due to a previously scheduled state court hearing in Georgetown beginning at 9:00 a.m. I cannot estimate when it will end, but in any event it is unlikely I will be back in Wilmington in time. For this reason, I respectfully ask permission to attend either telephonically or by videoconference, starting as soon as I am able to join.

Whether or not the Court grants my request, I would like to inform the Court of the modified position of the Media Intervenors. The Media Intervenors now request access to (i) the names and addresses of the top 50 non-individual creditors, and (ii) the names and addresses of non-individuals that have already revealed in public statements that they are customers and creditors. A number of entities have already “self-reported,” for example:

1. ATMTA Inc.

https://twitter.com/at_mwagner/status/1591178746085527552 (Nov. 11, 2022) (“ATMA had material cash exposure on deposit at FTX”).

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2. BlockFi.

<https://blockfi.com/november-14-2022-blockfi-update> (Nov. 14, 2022) (“that said, we do have significant exposure to FTX and associated corporate entities that encompasses obligations owed to us by Alameda, assets held at FTX.com, and undrawn amounts from our credit line with FTX.US”).

3. Celsius Network.

<https://twitter.com/CelsiusNetwork/status/1591167874177138689> (Nov. 11, 2022) (“In the interest of transparency, Celsius has approximately 3.5mm SRM tokens on FTX, most of which are locked, as well as loans to Alameda totaling approximately \$13MM (based on current values) which are currently under-collateralized (primarily by FTT tokens”).

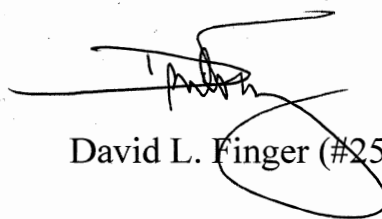
4) Coinbase.

<https://www.coinbase.com/blog/our-approach-to-transparency-risk-management-and-consumer-protection> (November 8, 2022) (“Currently we have \$15 million worth of deposits on FTX to facilitate business operations and client trades”).

Others include CoinShares, Galaxy Digital Holdings, Galois Capital, Hbit Limited, Hodlnaut Pte Limited, Ikigai Asset Management, Kraken, Liquid Meta Capital Holdings, NestCoin, and Voyager Digital (sources and citations can be provided if the Court desires).

I thank the Court for its kind consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "David L. Finger", is written over a circular stamp or seal.

David L. Finger (#2556)

cc: All parties eligible to receive notice via CM/ECF